

**Madison Food Park, LLC  
Cascade County Special Use Permit Application  
SUP Criteria – Expanded Responses  
August 2017**

Included below are the responses to “Section III – SUP Criteria” located within the Cascade County Special Use Permit Application. Original permit application text is included in *italics*.

*A) Explain how the proposed use meets all of the required criteria below. ALL CRITERIA MUST BE DISCUSSED. If criteria are not applicable, please explain why. Attach drawings, additional text, site plans, and any other documents that will assist staff and the board in reviewing the proposed use. The more information you can provide, the easier it is for staff and the Zoning Board of Adjustment to review the application.*

*1. The proposed development will not materially endanger the public health or safety.*

*a) Traffic conditions in the vicinity, including the effect of additional traffic on streets and street intersections, and sight lines at street intersections and approaches:*

Response: As shown on the attached exhibits, the property is located along US Hwy 89 approximately 6 miles west of Great Falls. Traffic conditions in the vicinity of the project will be increased due to the development. A traffic impact study will be completed for the purpose of identifying any/all requirements for mitigating traffic impacts, including dedicated turn lanes at the proposed project approach, or using other mitigating measures required by the review authority (Montana Department of Transportation).

*b) Provision of services and utilities, including sewer, water, electrical, telecommunications, garbage collections, and fire protection:*

Response: Wastewater treatment will be completed onsite using separate treatment systems for both domestic and animal waste. Domestic wastewater will likely be treated within a facultative lagoon prior to irrigation disposal while the industrial wastewater will be treated within an onsite treatment facility. Disposal of the industrial wastewater will likely also include spray irrigation or nearby agricultural ground. Water will be supplied by onsite wells and storage tanks. A new public water and wastewater system will be developed for the site which must be reviewed and approved by the Montana DEQ. Fire protection will be provided within the new onsite system using onsite storage and booster pumps. Electrical supply will be provided by NorthWestern Energy and telecommunications will likely be provided by Charter or CenturyLink through new service lines to the proposed development. In addition to the electrical service line provided by NWE, it is anticipated that the project will incorporate wind turbines to generate supplemental power for the facility's use.

*c) Soil erosion, sedimentation, and stormwater run-off:*

Response: As the site disturbance will be over 1 acre, a DEQ “General Permit for Storm Water Discharges Associated with Construction Activity” permit will be required and will address and mitigate soil erosion and sedimentation during construction, until a point when final site stabilization is complete. BMP's suggested by the DEQ will be utilized throughout construction to maintain water quality and minimize soil erosion. Following construction, stormwater runoff will be collected within onsite detention basins and discharged at predevelopment rates as required by DEQ Circular 8.

- d) *Protection of public, community, or private water supplies, including possible adverse effects on surface waters or ground water:*

Response: A new public water supply will be constructed to serve the development and well construction and protection requirements within DEQ Circulars 1 & 3 and the Administrative Rules of Montana will be followed to protect the new public water supply and groundwater within the general vicinity of the project. Surface waters in the vicinity of the project will be protected by maintaining effective runoff collection and conveyance to the onsite detention ponds where stormwater can be treated and detained prior to discharge. Additionally, wastewater collection and treatment ponds will be safeguarded against impacting local groundwater and surface water by utilizing adequate liners and best management practices to avoid leaks and spills.

2. *The proposed development is a public necessity, or will not substantially impact the value of adjoining property.*

- a) *The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.*

Response: The proposed development is agriculturally based and thereby complements the existing uses of the surrounding properties. Additionally, the facility is proposed to be centrally located within the relatively large subject properties which will help eliminate any potential conflicts with surrounding land uses. Potential impacts will be mitigated using strategic landscape placement to obscure visual impacts and treatment alternatives so as to prevent visual and olfactory nuisance potential.

- b) *Whether the proposed development is so necessary to the public health, safety, and general welfare of the community or County as a whole as to justify it regardless of its impact on the value of adjoining property.*

Response: The MFP Development cannot be objectively evaluated on the basis of either its positive or negative impact on public health, safety and general welfare of the community, or its impact on the value of adjoining properties at this time as the actual measurable impacts will need to be assessed by the County, its agents or departments. Once that official review process has been initiated, the permit applicant will be in a position to address those specific issue. While the project is not necessary for public health and safety, the County and its residents will benefit from the project through the increased tax base as well as through the addition of nearly 3,000 direct jobs to the local economy.

3. *The proposed development will be in harmony with the area in which it is located.*

- a) *The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.*

Response: The proposed project is a food processing plant which will include spray irrigated agriculture ground which both generally match the existing agricultural land uses within the surrounding area. As noted on Montana Cadastral (refer Exhibit B), the surrounding area is made up of agriculturally zoned properties with areas of animal grazing, fallow land, and wild hay. As noted, some surrounding land use does consist of residential single-family homes as shown. As noted on Exhibit A and required by the County's zoning regulations, no buildings, animal storage, grazing, or butchering shall be located within one mile of the existing residences. This one-mile buffer will help mitigate any potential conflicts with the existing residences and maintain compatible land uses with the other surrounding properties.

4. *The proposed development will be consistent with the Cascade County Growth Policy.*

- a) *Consistency with the Growth Policy objectives for the various planning areas (Please address all five goals with a separate sheet of paper).*

Goal 1: Sustain and strengthen the economic well-being of Cascade County's citizens.

*Objectives:*

- A) *Stimulate the retention of existing businesses and expansion of existing businesses, new businesses, value-added businesses, wholesale and retail businesses, and industries including agriculture, mining, manufacturing/processing and forest products.*

Response: The proposed development will be agriculturally based and will utilize livestock and feed produced by area farmers and ranchers which will help boost the local agricultural economy and maintain existing ag-based businesses in the area. The proposed development will be a new addition to the agricultural industry in the area.

- B) *Stabilize and diversify the county's tax base by encouraging the sustainable use of its natural resources.*

Response: As noted above, the proposed project will increase the County's tax base with the implementation of this project. Additionally, water utilized within the food processing will be treated and used beneficially to spray irrigate onsite and nearby crops. The wastewater treatment and spray irrigation will also ensure that local farm ground is still utilized as part of the project.

- C) *Identify and pursue primary business development that complements existing business, which is compatible with communities, and utilizes available assets. Identify and pursue targeted business development opportunities to include, but not limited to, manufacturing/heavy industry, telecommunication, and youth/social services.*

Response: The proposed business is primarily agriculturally based which complements the existing primary business of area residents and maintains compatibility with the surrounding area and County as a whole. The business will also utilize livestock and feed produced by area residents which will help strengthen the local economy.

- D) *Promote the development of cultural resources and tourism to broaden Cascade County's economic base.*

Response: The proposed development has the potential to help develop tourism and cultural resources within the County as the added taxes collected from the development are put into beneficial use. Although the Distillery, Cheese Processing Plant, and related processing facilities located within the MFP Development may consider offering promotional/educational opportunities for the public to view specific aspects of the operations in the future, the principals have adopted a comprehensive bio-security program for the entire site and have no intention at this time of offering any tours or related public viewing events.

- E) *Foster and stimulate well-planned entrepreneurship among the county's citizenry.*

Response: The MFP Development project has the potential to act as an economic catalyst for both aligned and peripheral value added agriculture business ventures and entrepreneurial start-ups to locate their business enterprises in Cascade County to take advantage of the capacity, infrastructure, and market access directly created by the MFP development.

*F) Promote a strong local business environment. Encourage and strengthen business support mechanisms such as chamber of commerce, development organizations and business roundtable organizations.*

Response: Extensive investment in infrastructure by the principals in MFP, working in collaboration with both the County and State, will provide the local business community, local government, and community development corporations with a necessary tool to promote business development across the region. In addition, the local chamber, CDC's, and business promotional groups will have the opportunity to promote development and additional investment by demonstrating the commitment made by MFP in developing its operations locally.

*G) Improve local trade capture for Cascade County businesses. Promote local shopping as well as well-planned businesses and new businesses.*

Response: As indicated in the initial projection compiled by the principals of the MFP development, when operating at peak capacity, the Food Park project will directly employ over 3,000 people. The projected influx of workers, and their families, will have a measurable economic impact on every aspect of the community, including existing and expanding business enterprises across the spectrum of manufacturing wholesale, retail, distribution, etc.

*H) Network with and support other economic development efforts in the region and statewide, in recognition of Cascade County's interdependence with other communities and to leverage available local resources.*

Response: See previous responses.

*I) Encourage the growth of the agricultural economy.*

Response: The central development concept informing and guiding the entire MFP project is the support and expansion of local livestock production, stabilization of related markets and expansion of product supply chains, along with investment in agri-business based enterprises which directly support farmers and ranchers across the golden triangle and the state of Montana. By demonstrating its commitment to supporting the plight of Montana's most vital agricultural industries, the principals of the MFP fully anticipate that both producers and an assortment of businesses which rely upon their survival and success will commit their support and resources to building on the momentum created by the MFP project.

*J) Stimulate the growth of the economy by encouraging the use of alternative methods of energy production, including wind energy.*

Response: The principals of the MFP development project are committed to making a significant investment in bringing green technology to the entire MFP campus. As such, the design, development and infrastructure will reflect a commitment to incorporating alternative energy and energy efficient technology in the areas of solar, wind, geothermal, bio-mass, carbon reduction, waste water filtration and treatment.

*Goal 2: Protect and maintain Cascade County's rural character and the community's historic relationship with natural resource development.*

*Objectives:*

- A) Foster the continuance of agriculture and forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests.*

Response: As noted above, the proposed agriculture business will include irrigated farmlands for the disposal of treated wastewater effluent. Additionally, the proposed buffer around the facility will maintain existing ag-related lands to help maintain compatibility with adjacent farm and grazing lands.

- B) Preserve Cascade County's scenic beauty and conserve its forests, rangeland and streams, with their abundant wildlife and good fisheries.*

Response: The property where the MFP project is taking place is currently utilized for both livestock grazing and dryland farming which will be maintained to the greatest extent possible following the development. Available land following the project development will continue to be utilized for farming activities to both preserve the existing land use as well as provide a location to beneficially dispose of treated wastewater through spray irrigation. No streams or existing fisheries will be impacted by the proposed project.

- C) Preserve Cascade County's open space setting by encouraging new development to locate near existing towns and rural settlements and by discouraging poorly designed, land subdivisions and commercial development.*

Response: As noted above, the project is agriculturally based and requires a large land area to house the proposed structures as well as the wastewater treatment system and farmland for the spray irrigation disposal; therefore, developing the project near an existing town was not feasible. The project does include large areas of open space and farmland which will maintain the County's existing open space setting. Additionally, the facility will be located within the center of the large property which will help minimize any encroachment on surrounding properties. The development is being designed by a team of trained professionals who specialize in both large-scale developments and subdivisions as well as food processing plants of this nature to avoid poor design decisions.

- D) Assure clean air, clean water, a healthful environment and good community appearance.*

Response: The A&E firm retained for the project has been tasked with creating aesthetic design elements in construction, as well as incorporating indigenous landscaping along with strategic placement of buildings and related structures so as to take full advantage of the natural contours and "lines of sight" that are central features of the property. The master development plan includes strategic design measures directly targeted to mitigate any potential detectable, residual odor elements associated with the processing facility. The principals of the MFP development are committed to investing in technology and infrastructure placement which maximizes the ability of the design team to assure clean air, water and a healthful environment while mitigating where and when possible the potential negative impact on these elements within the scope of the facilities and MFP commercial campus.

- E) Support the development of natural resources including but not limited to timber, mining, oil and gas production and renewable energy production.*

Response: While the project will not directly support the development of timber, mining, or oil and gas production, it will incorporate the use of wind turbines to help power the development and minimize the impacts on the existing power grid in the area.

- F) Continue to work with federal and state agencies to redevelop properties within Cascade County which are currently undergoing Superfund and Brownfield processes.*



Response: The project is not located in an area undergoing Superfund or Brownfield processes.

Goal 3: Maintain agricultural economy.

*Objectives:*

*A) Protect the most productive soil types.*

Response: Refer to the attached NRCS soil report. As shown on the soil report, portions of the property purchased by MFP are considered Prime Farmland or Farmland of Statewide Importance. As noted above, a large portion of the site will remain following development which will continue to be utilized for agricultural activities. Additionally, the value-added agriculture development will encourage further utilization of existing farm and rangeland within Cascade County and the surrounding area.

*B) Continue to protect soils against erosion.*

Response: As noted above, during construction the site will be required to meet DEQ standards for erosion protection through the construction stormwater permitting process. Following construction, permanent BMPs will be put in place to minimize erosion on the steep slopes within the steeper portions of the property while agricultural activities will remain on other open spaces within the property which will effectively protect against erosion.

*C) Protect the floodplain from non-agricultural development.*

Response: The proposed project is located outside of the FEMA flood map boundaries; however, it appears as though the lower portion of Antelope Coulee is included within the 100-year floodplain at its intersection with Sand Coulee Creek (refer to attached excerpt from FIRM panel 30013C0634E). Due to the steep banks of Antelope Coulee within the vicinity of the subject property, it is not anticipated that the floodplain is extensive within the subject property. Work activities will not be taking place within the active streambed or within the floodplain and the creek will be protected from non-agricultural development.

*D) Support the development of value-added agricultural industry in Cascade County utilizing the products from the regional area.*

Response: As noted previously, the intent of the proposed project is to develop a large-scale value-added agriculture-based food park which will utilize regional livestock and grains.

Goal 4: Retain the presence of the US Military in Cascade County

*Objectives:*

*A) Encourage the federal congressional delegation to actively support maintaining the current mission status at a minimum.*

Response: While the applicant's proposed development will not directly impact the US Military's operations in Cascade County, the applicant recognizes the importance and value of the current military missions and what they mean to the County and Northcentral Montana. The applicant will take an active role in local civic duties and responsibilities as managers and employees of the plant become acquainted

with and involved in the Great Falls business community (i.e., Great Falls Chamber of Commerce, Military Affairs Committee, etc.).

*B) Promote the location of additional military missions in Cascade County.*

Response: The applicant hereby pledges its support to Cascade County in promoting additional military missions in Cascade County. Also, please see response to Objective A) above.

*C) Encourage the reactivation of the runway at Malmstrom Air Force Base for fixed wing operations.*

Response: The applicant hereby pledges to Cascade County its support in reactivating the runway at MAFB for fixed wing operations. Also, please see response to Objective A) above.

*D) Refer to the Joint Land Use Study for resolving conflicts and promoting mission compatible development.*

Response: The applicant hereby acknowledges there are certain building placement and building height restrictions adjacent to and in the vicinity of Malmstrom Air Force Base. Such restrictions are further defined within the Joint Land Use Study. The applicant is prepared to resolve any potential conflicts so as to ensure mission-compatible development. Also, please see response to Objective A) above.

*Goal 5: Preserve and enhance the rural, friendly and independent lifestyle currently enjoyed by Cascade County's citizens.*

*Objectives:*

*A) Maintain Cascade County's citizens independent lifestyle and minimize local governmental intervention, to the extent possible, consistent with the requirements of a continually evolving economy and constantly changing population.*

Response: The proposed project will not impact the County's citizen's independent lifestyle and will not require local governmental intervention.

*B) Preserve and promote Cascade County's rich cultural heritage, rooted in natural resource development and reflected in its numerous cultural/historic sites and archaeological areas.*

Response: As noted above, the principals of the MFP development project are committed to making a significant investment in bringing green technology to the entire MFP campus. This commitment to green energy will reduce the natural impacts associated with the project and will help maintain the existing natural resources. Additionally, the treatment and reuse of wastewater will allow MFP to recycle and beneficially utilize the water for agriculture. The proposed project will be located on previously cultivated ground which will minimize the potential for impacting existing historical or archaeological sites.

*C) Promote fire prevention measures throughout the county, giving special emphasis to the extreme fire hazards present at the wild land/urban interface.*

Response: The project will incorporate onsite storage and pumps to provide onsite fire prevention measures to the structures. Additionally, the onsite fire storage may be available for local use in the event of emergency if necessary as a hydrant can be placed onsite for local fire department use. The fire storage which may be used for regional firefighting activities will benefit all residents and land owners in the vicinity of the project.

*D) Encourage the continued development of educational programs and facilities, recreational opportunities and spaces and health services for all county residents.*

Response: The principals of the MFP development intend to develop training and apprenticeship opportunities with Montana State University and local colleges to aid in the preparation of local residents for job opportunities offered at the MFP. These educational programs will also work to educate the community on the MFP and its operation. While the project will not directly impact the development of educational programs and facilities, recreational opportunities and spaces and health services, it will help the County continue to develop those programs and opportunities for the County's residents through the added tax base and the additional budget available through the collection of those taxes.

*E) Consistency with the municipal and joint land use plans incorporated by the Growth Policy.*

Response: The proposed project is located within the Military Overlay District surrounding Malmstrom AF Base. The project site is located within the outer horizontal surface meaning structures are restricted in height to a maximum of 500' above the established airfield elevation which will be maintained by all proposed structures. The potential implementation of wind turbines for renewable energy generation will be coordinated with the FAA, Cascade County, and MAFB as needed.